

1 Presented to the Court by the foreman of the  
2 Grand Jury in open Court, in the presence of  
3 the Grand Jury and FILED in the U.S.  
4 DISTRICT COURT at Seattle, Washington.

5 FEBRUARY 29 2012  
6 WILLIAM M. McCOOL, Clerk  
7 By \_\_\_\_\_ Deputy  
8

9  
10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON  
12 AT TACOMA

13 UNITED STATES OF AMERICA,

CR 12 NO. 5075 BHS

14 Plaintiff, } INDICTMENT

v.

15 EMILIAN MADALIN NITA,

16 Defendant. )

17 The Grand Jury charges that:

18  
19 **COUNT ONE**  
20  
21 (Use of Forged Passport)

22 On or about December 28, 2010, at Bremerton, within the Western District of  
23 Washington, the defendant, EMILIAN MADALIN NITA, did willfully and knowingly  
24 use a false, forged, counterfeited, and altered passport, to wit, by presenting a false,  
25 forged, counterfeited, and altered Slovakian passport, in the false name of D.S., in order  
26 to open a bank account at a branch of Bank of America.

27 All in violation of Title 18, United States Code, Section 1543.

28  
29 **COUNT TWO**  
30 (Use of Forged Passport)

31 On or about January 20, 2011, at Silverdale, within the Western District of  
32 Washington, the defendant, EMILIAN MADALIN NITA, did willfully and knowingly

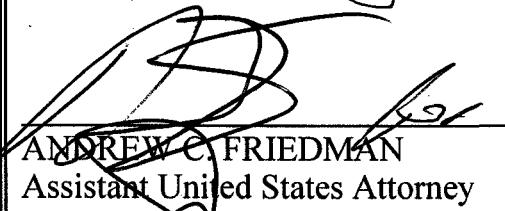
1 use a false, forged, counterfeited, and altered passport, to wit, by presenting a false,  
2 forged, counterfeited, and altered Slovakian passport, in the false name of D.S., in order  
3 to open a bank account at a branch of Bank of America.

4 All in violation of Title 18, United States Code, Section 1543.

5 A TRUE BILL:

6 DATED: 2/29/12

7 *Signature of Foreperson redacted pursuant*  
8 *to the policy of the Judicial Conference*

9 \_\_\_\_\_  
10 FOREPERSON  
11   
12 JENNY A. DURKAN  
13 United States Attorney  
14   
15 ANDREW C. FRIEDMAN  
16 Assistant United States Attorney  
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18 DAVID REESE JENNINGS  
19 Assistant United States Attorney  
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